

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 13CR334 MV

CRYSTAL TORRES,

Defendant.

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW the Defendant, Crystal Torres, by and through her attorney, John V. Butcher, Assistant Federal Public Defender, and entreats this Court to vacate the current sentencing hearing of September 4, 2014, and to continue it until after October 4, 2014. Additionally, Ms. Torres would request the sentencing memorandum deadline be extended until August 21, 2014.

In support of her motion, Ms. Torres states as follows:

1. Ms. Torres pled guilty to one count of aggravated assault with a dangerous weapon in violation of 18 U.S.C. §113(a)(3). Ms. Torres is not in custody.

2. Ms. Torres has significant mental and physical health issues. She has scheduled medical procedures and testing and mental health counseling in September 2014. She has a doctor's appointment on October 4, 2014, to discuss the September testing and to decide on a course of treatment.

3. The parties have been in contact in an attempt to use their and the Court's resources efficiently, to reduce litigation and attempt to resolve the instant case.

4. Defense counsel has been preparing for a C.L.E. lecture in Las Cruces, New Mexico, on Friday, August 22, 2014.

5. Pursuant to local rules, defense counsel has contacted Assistant U.S. Attorney Elaine Y. Ramirez. The government does not oppose this continuance.

6. This instant motion is the fourth request to continue sentencing hearing and memorandum deadline.

WHEREFORE, based upon the foregoing, Ms. Torres respectfully requests that this Court enter an order vacating the current sentencing hearing scheduled for September 4, 2014, and to continue it until after October 4, 2014. Moreover, Ms. Torres respectfully requests that this Court extend the sentencing memorandum deadline until August 21, 2014

I HEREBY CERTIFY THAT on the
18th day of September 2014, I filed
the foregoing electronically through the
CM/ECF system, which caused AUSA
Elaine Y. Ramirez to be served by
electronic means, as more fully reflected
on the Notice of Electronic Filing.

/s

Respectfully submitted,

FEDERAL PUBLIC DEFENDER
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/s
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Attorney for Defendant

